

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

STEPHANIE LUKIS and ROBERT FISCHER,	)	
individually and on behalf of all others similarly	)	
situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:19-cv-04892
	)	
INSTANT CHECKMATE, LLC,	)	
	)	
Defendant.	)	

**UNOPPOSED MOTION FOR STIPULATED PROTECTIVE ORDER**

Defendant, INSTANT CHECKMATE, LLC (“Instant Checkmate”) by its attorneys, Gordon Rees Scully Mansukhani, LLP, and for its Unopposed Motion for Entry of a Protective Order, states as follows:

1. Instant Checkmate has been requested to produce documents and material containing Instant Checkmate’s commercially sensitive business information.
2. Plaintiffs believe this information and these documents are relevant to the claims and defenses at issue in the case.
3. Instant Checkmate seeks to avoid public disclosure of the aforementioned documentation, as it contains confidential and proprietary material.
4. Instant Checkmate provided the proposed Protective Order to Plaintiff’s counsel, and Plaintiff’s counsel has agreed to the entry of the proposed Protective Order.
5. Instant Checkmate requests that this Court enter the proposed Protective Order.
6. Pursuant to the Court’s standing order governing submission of agreed protective orders, Instant Checkmate has submitted a copy of the parties’ Agreed Protective Order to the Court at Proposed\_Order\_Feinerman@ilnd.uscourts.gov contemporaneously with the filing of this Motion

WHEREFORE, Defendant, INSTANT CHECKMATE, LLC respectfully requests that this Court grant its motion for entry of a protective order and for such further relief as this court deems appropriate and just.

Dated: November 6, 2020

Respectfully submitted,

**INSTANT CHECKMATE, LLC**, Defendant

By: /s/ Benjamin Kinney  
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*Attorneys for Instant Checkmate, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2020, I electronically filed the foregoing with the Clerk of the U.S. District Court, Northern District of Illinois, the foregoing by using the CM/ECF system, which will send notification of such filing(s) to:

**Attorney for Plaintiff, Robert Fischer and Stephanie Lukis, Individually and on behalf of all others similarly situated**

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/s/ Benjamin Kinney

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